



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

PEDRAM MEHRIAN,
aka "Abraham Mehrian,"

Defendant.

CR No. 2:24-cr-00084 -GW

I N D I C T M E N T

[18 U.S.C. § 1343: Wire Fraud; 18
U.S.C. § 981(a)(1)(C) and 28
U.S.C. § 2461(c)]: Criminal
Forfeiture]

The Grand Jury charges:

COUNTS ONE THROUGH FIVE

[18 U.S.C. § 1343]

A. INTRODUCTORY ALLEGATIONS

1. At times relevant to this Indictment:

The Defendant and Relevant Entities

a. Defendant PEDRAM MEHRIAN, also known as "Abraham Mehrian," was a resident of Los Angeles, California.

b. Defendant MEHRIAN owned, managed, and controlled the following business entities, all based in California: Strong Faith LLC ("Strong Faith"); Family Financial Strategies, Inc. ("Family Financial"); Mehrian Senior Lifestyle Movement LLC ("MSLM"); Trans 26

1 Integrated Services LLC ("Trans 26"); and Supreme Executive Authority
2 LLC ("Supreme Executive").

3 c. Defendant MEHRIAN owned, controlled, and was a
4 signatory on the following bank accounts, all located in Los Angeles
5 County, California:

6 i. A U.S. Bank checking account ending in 0662, in
7 the name of Strong Faith LLC (the "Strong Faith U.S. Bank Account");

8 ii. A Bank of America checking account ending in 2784
9 in the name of Family Financial Strategies, Inc. (the "Family
10 Financial Account");

11 iii. A U.S. Bank checking account ending in 1287 in
12 the name of Mehrian Senior Lifestyle Movement LLC (the "MSLM
13 Account");

14 iv. A U.S. Bank checking account ending in 8292 in
15 the name of Trans 26 Integrated Services LLC (the "Trans 26
16 Account"); and

17 v. A U.S. Bank checking account ending in 4159 in
18 the name of Supreme Executive Authority, LLC (the "Supreme Executive
19 Account").

20 The Economic Injury Disaster Loan Program

21 d. The Coronavirus Aid, Relief, and Economic Security
22 ("CARES") Act was a federal law enacted in or about March 2020 that
23 was designed to provide emergency financial assistance to Americans
24 suffering economic harm as a result of the COVID-19 pandemic.

25 e. The Economic Injury Disaster Loan Program ("EIDL") was
26 a United States Small Business Administration ("SBA") program that
27 provided low-interest financing to small businesses, renters, and
28 homeowners in regions affected by declared disasters.

1 f. The CARES Act authorized the SBA to provide EIDL loans
2 of up to \$2 million to eligible small businesses experiencing
3 substantial financial disruption due to the COVID-19 pandemic.

4 g. To obtain an EIDL loan, a qualifying business was
5 required to submit an application to the SBA and provide information
6 about the business's operations, such as the number of employees,
7 gross revenues for the 12-month period preceding the disaster, and
8 cost of goods sold in the 12-month period preceding the disaster. In
9 the case of EIDL loans for COVID-19 relief, the 12-month period was
10 the 12-month period from January 31, 2019, to January 31, 2020. The
11 applicant was also required to certify that all of the information in
12 the application was true and correct to the best of the applicant's
13 knowledge.

14 h. EIDL loan applications were submitted directly to the
15 SBA and processed by the agency with support from a government
16 contractor. The amount of the loan, if the application was approved,
17 was determined in part based on the information provided by the
18 applicant about employment, revenue, and cost of goods sold. Any
19 funds issued under an EIDL loan were issued directly by the SBA.

20 i. EIDL loan funds could be used for payroll expenses,
21 sick leave, production costs, and business obligations of the
22 applicant entity, such as debts, rent, and mortgage payments.
23 Borrowers, as part of the EIDL loan application, certified that they
24 would use loan proceeds "solely as working capital to alleviate
25 economic injury caused by disaster occurring in the month of January
26 31, 2020 and continuing thereafter."

1 B. THE SCHEME TO DEFRAUD

2 2. Beginning no later than in or about May 2020, and
3 continuing through at least September 2020, in Los Angeles County,
4 within the Central District of California, and elsewhere, defendant
5 MEHRIAN, together with others known and unknown to the Grand Jury,
6 knowingly and with the intent to defraud, devised, participated in,
7 and executed a scheme to defraud the SBA as to material matters, and
8 to obtain money and property by means of material false and
9 fraudulent pretenses, representations, and promises, and the
10 concealment of material facts.

11 3. The scheme to defraud operated, in substance, as follows:

12 a. Defendant MEHRIAN submitted, and caused to be
13 submitted, false and fraudulent applications to the SBA for EIDL
14 loans on behalf of Strong Faith, Family Financial, MSLM, Trans 26,
15 and Supreme Executive (collectively, the "MEHRIAN Entities").

16 b. In each application, defendant MEHRIAN made and caused
17 to be made false statements, representations, and promises to the SBA
18 in connection with obtaining EIDL loan funds for the MEHRIAN
19 Entities, including: misrepresenting the number of employees of the
20 applicant entity; and providing false information regarding the
21 revenue, cost of goods sold, and business purpose of the applicant
22 entity.

23 c. In each loan agreement, defendant MEHRIAN falsely
24 certified that the loan proceeds would be used as permissible working
25 capital for the respective applicant entity, and that all information
26 submitted in or with each loan application was true and accurate.

27 d. By his materially false and fraudulent statements and
28 his concealment of material facts, defendant MEHRIAN caused the SBA

1 to approve EIDL loans and to disburse EIDL loan proceeds to which he
2 and the MEHRIAN Entities were not entitled, which proceeds were
3 deposited into bank accounts that were controlled by defendant
4 MEHRIAN.

5 e. In contradiction to the multiple certifications
6 defendant MEHRIAN made in the loan applications and loan agreements,
7 defendant MEHRIAN used and caused to be used the fraudulently
8 obtained EIDL loan proceeds for his personal benefit, including for
9 expenses prohibited under the requirements of the EIDL program, such
10 as transfers to pay obligations of unrelated business entities and to
11 pay his personal expenses.

12 4. From in or about May 2020 and continuing until at least in
13 or about December 2020, in furtherance of the scheme, defendant
14 MEHRIAN submitted and caused to be submitted fraudulent EIDL loan
15 applications seeking approximately \$2.2 million, and actually
16 received approximately \$599,900 in EIDL proceeds to which he was not
17 entitled.

18 C. USE OF INTERSTATE WIRES

19 5. On or about the dates set forth below, within the Central
20 District of California, and elsewhere, for the purpose of executing
21 the scheme to defraud described above, defendant MEHRIAN transmitted
22 and caused the transmission of the following items by means of wire
23 communication in interstate commerce:

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COUNT	DATE	INTERSTATE WIRING
ONE	06/30/2020	Transfer of approximately \$8,000 from the SBA in Colorado to the Supreme Executive Account in Los Angeles, California
TWO	08/11/2020	Transfer of approximately \$149,900 from the SBA in Colorado to the Family Financial Account in Los Angeles, California
THREE	09/1/2020	Transfer of approximately \$141,800 from the SBA in Colorado to the MLSM Account in Los Angeles, California
FOUR	09/12/2020	Transfer of approximately \$149,900 from the SBA in Colorado to the Strong Faith Account in Los Angeles, California
FIVE	9/15/2020	Transfer of approximately \$149,900 from the SBA in Colorado to the Trans 26 Account in Los Angeles, California

FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of defendant PEDRAM MEHRIAN's conviction of the offenses set forth in any of Counts One through Five of this Indictment.

2. Defendant MEHRIAN, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offenses; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

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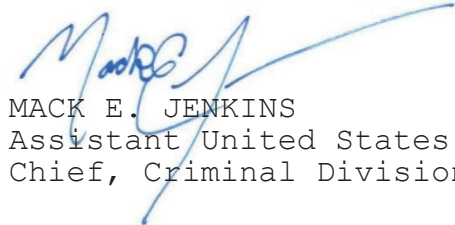
substantially diminished in value; or (e) has been commingled with
other property that cannot be divided without difficulty.

A TRUE BILL

/s/

Foreperson

E. MARTIN ESTRADA
United States Attorney



MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division

RANEE A. KATZENSTEIN
Assistant United States Attorney
Chief, Major Frauds Section

SCOTT PAETTY
Assistant United States Attorney
Deputy Chief, Major Frauds Section